

**REGISTER OF ACTIONS**CASE NO. C-1682-19-II

Raquel Ruth Moreno VS. Bluestone Asset Management, LLC, Raybec  
Crossing Court, LLC, Raybec Crossing North, LLC

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\$

Case Type: Injury or Damage - Other (OCA)  
Date Filed: 04/15/2019  
Location: 389th District Court

**PARTY INFORMATION**

<b>Defendant</b>	<b>Bluestone Asset Management, LLC</b>	<b>Attorneys</b> <b>Thomas A. Crosley</b> <i>Retained</i> 210-354-4500(W)
		<b>JOHN A. GUERRA</b> <i>Retained</i> 210-979-0100(W)
<b>Defendant</b>	<b>Raybec Crossing Court, LLC</b>	
<b>Defendant</b>	<b>Raybec Crossing North, LLC</b>	
<b>Plaintiff</b>	<b>Moreno, Raquel Ruth</b>	<b>RICARDO A. RODRIGUEZ</b> <i>Retained</i> 956-686-5336(W)

**EVENTS & ORDERS OF THE COURT**

<b>OTHER EVENTS AND HEARINGS</b>			
04/15/2019	<u>Original Petition (OCA)</u>		
04/15/2019	<u>Request for Service</u>		
04/15/2019	<u>Citation By Certified Mail</u>		
	Bluestone Asset Management, LLC	Served	04/19/2019
		Returned	04/19/2019
04/15/2019	<u>Citation Issued</u>		
05/07/2019	<u>Request for Service</u>		
05/07/2019	<u>Citation By Certified Mail</u>		
	Raybec Crossing Court, LLC	Unserved	
	Raybec Crossing North, LLC	Unserved	
05/07/2019	<u>Citation Issued</u>		
05/10/2019	<u>Defendant's Original Answer</u>		
05/10/2019	<u>Jury Demand</u>		
05/14/2019	<u>Request</u>		
	FOR CERTIFIED COPIES		
08/15/2019	Tickler (6:00 PM) (Judicial Officer Lopez, Letty)		

**FINANCIAL INFORMATION**

	<b>Defendant Bluestone Asset Management, LLC</b>		
	Total Financial Assessment		67.00
	Total Payments and Credits		67.00
	Balance Due as of 05/20/2019		0.00
05/13/2019	Transaction Assessment		42.00
05/13/2019	EFile Payments from	Receipt # DC-2019-037470	
	TexFile	Bluestone Asset Management, LLC	(42.00)
05/14/2019	Transaction Assessment		25.00
05/14/2019	EFile Payments from	Receipt # DC-2019-038133	
	TexFile	Bluestone Asset Management, LLC	(25.00)
	<b>Plaintiff Moreno, Raquel Ruth</b>		
	Total Financial Assessment		618.00
	Total Payments and Credits		618.00
	Balance Due as of 05/20/2019		0.00
04/15/2019	Transaction Assessment		299.00
04/15/2019	EFile Payments from	Receipt # DC-2019-029832	
	TexFile	Moreno, Raquel Ruth	(299.00)

04/15/2019	Transaction Assessment			107.00
04/15/2019	EFile Payments from	Receipt # DC-2019-029847	Moreno, Raquel Ruth	(107.00)
	TexFile			
05/07/2019	Transaction Assessment			212.00
05/07/2019	EFile Payments from	Receipt # DC-2019-035971	Moreno, Raquel Ruth	(212.00)
	TexFile			

**NO. C-1682-19-H**

RAQUEL RUTH MORENO	§	IN THE DISTRICT COURT, LLC
Plaintiff,	§	
	§	
V.	§	_____ JUDICIAL DISTRICT
	§	
BLUESTONE ASSET MANAGEMENT,	§	
LLC, RAYBEC CROSSING, COURT,	§	
LLC AND RAYBEC CROSSING NORTH,	§	
LLC		
Defendants.	§	OF HIDALGO COUNTY, TEXAS

**PLAINTIFF'S ORIGINAL PETITION****TO THE HONORABLE JUDGE OF SAID COURT:**

**NOW COMES** Raquel Ruth Moreno, hereinafter called "Plaintiff", complaining of and about Bluestone Asset Management, LLC, Raybec Crossing Court, LLC, and Raybec Crossing North, LLC, jointly and severally hereinafter called "Defendants", and for cause of action would show unto the Court the following:

**DISCOVERY CONTROL PLAN LEVEL**

1. Plaintiff affirmatively pleads that she seeks only monetary relief aggregating \$100,000 or less, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees, and intends that discovery be conducted under Discovery Level 1.

**PARTIES AND SERVICE**

2. Plaintiff is an Individual whose address is 102 N. Palmas St., Weslaco, Texas 78596.

**C-1682-19-H**

3. The last three numbers of Plaintiff's driver's license number are 564.

4. Defendant Bluestone Asset Management, LLC, a Nonresident Limited Liability Company, has conducted business in the State of Texas. This action arises out of the business of said Defendant in this state. Defendant Bluestone Asset Management, LLC is not required by statute to designate or maintain a registered agent for service of process in the State of Texas. Service of process pursuant to Section 17.043 of the Texas Civil Practice and Remedies Code may therefore be effected by serving the person in charge of the business of said Defendant, Norman Litz, a citation *directed to said Defendant*, at the following address: 7855 Gross Point Rd. UT F, Skokie, IL 60077. Service of said Defendant as described above can be effected by certified mail, return receipt requested.

5. Defendant Raybec Crossing Court, LLC, a Nonresident Limited Liability Company, has conducted business in the State of Texas. This action arises out of the business of said Defendant in this state. Defendant Raybec Crossing Court, LLC is not required by statute to designate or maintain a registered agent for service of process in the State of Texas. Service of process pursuant to Section 17.043 of the Texas Civil Practice and Remedies Code may therefore be effected by serving the person in charge of the business of said Defendant, a citation *directed to said Defendant*, at the following address: 7855 Gross Point Rd. UT F, Skokie, IL 60077. Service of said Defendant as described above can be effected by certified mail, return receipt requested.

6. Defendant Raybec Crossing North, LLC, a Nonresident Limited

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Liability Company, has conducted business in the State of Texas. This action arises out of the business of said Defendant in this state. Defendant Raybec Crossing North, LLC is not required by statute to designate or maintain a registered agent for service of process in the State of Texas. Service of process pursuant to Section 17.043 of the Texas Civil Practice and Remedies Code may therefore be effected by serving the person in charge of the business of said Defendant, a citation *directed to said Defendant*, at the following address: 7855 Gross Point Rd. UT F, Skokie, IL 60077. Service of said Defendant as described above can be effected by certified mail, return receipt requested.

**JURISDICTION AND VENUE**

7. The subject matter in controversy is within the jurisdictional limits of this Court.

8. Plaintiff seeks:

a. only monetary relief of \$100,000 or less, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees.

9. This Court has jurisdiction over Defendant Bluestone Asset Management, LLC, because said Defendant purposefully availed itself of the privilege of conducting activities in the state of Texas and established minimum contacts sufficient to confer jurisdiction over said Defendant, and the assumption of jurisdiction over Bluestone Asset Management, LLC will not offend traditional notions of fair play and substantial justice and is consistent with the constitutional requirements of due process.

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10. Plaintiff would show that Defendant Bluestone Asset Management, LLC had continuous and systematic contacts with the state of Texas sufficient to establish general jurisdiction over said Defendant.

11. This Court has jurisdiction over Defendant Raybec Crossing Court, LLC, because said Defendant purposefully availed itself of the privilege of conducting activities in the state of Texas and established minimum contacts sufficient to confer jurisdiction over said Defendant, and the assumption of jurisdiction over Raybec Crossing Court, LLC will not offend traditional notions of fair play and substantial justice and is consistent with the constitutional requirements of due process.

12. Plaintiff would show that Defendant Raybec Crossing Court, LLC had continuous and systematic contacts with the state of Texas sufficient to establish general jurisdiction over said Defendant.

13. This Court has jurisdiction over Defendant Raybec Crossing North, LLC, because said Defendant purposefully availed itself of the privilege of conducting activities in the state of Texas and established minimum contacts sufficient to confer jurisdiction over said Defendant, and the assumption of jurisdiction over Raybec Crossing North, LLC will not offend traditional notions of fair play and substantial justice and is consistent with the constitutional requirements of due process.

14. Plaintiff would show that Defendant Raybec Crossing North, LLC had continuous and systematic contacts with the state of Texas sufficient to establish

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general jurisdiction over said Defendant.

15. Venue in Hidalgo County is proper in this cause under Section 15.002(a)(1) of the Texas Civil Practice and Remedies Code because all or a substantial part of the events or omissions giving rise to this lawsuit occurred in this county.

**FACTS**

16. At all times material hereto, Defendant Bluestone Asset Management, LLC was the possessor of the property in question and either owned, managed, occupied or maintained the premises located at 1401 W. Dove Ave., McAllen, Texas 78504 (the "Premises or Property").

17. At all times material hereto, Defendant Raybec Crossing Court, LLC was the possessor of the Property in question and either owned, occupied or maintained the Premises.

18. At all times material hereto, Defendant Raybec Crossing North, LLC was the possessor of the Property in question and either owned, occupied or maintained the Premises.

19. Raquel Ruth Moreno leased one apartment at the Property as a tenant under a lease agreement. Accordingly, she was an invitee to the common areas of the Premises.

20. During the time that Raquel Ruth Moreno was upon Defendants' Property, Raquel Ruth Moreno was seriously injured as a result of a dangerous condition in that she was walking in the stairs to enter Plaintiff's apartment when

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she slipped and fall landing on her right knee.

21. Raquel Ruth Moreno's bodily injuries occurred as a direct result of a fall that was proximately caused by the dangerous condition described above, which Defendants knew or, in the exercise of ordinary care, should have known existed.

**LIABILITY OF DEFENDANT BLUESTONE ASSET MANAGEMENT, LLC**

22. At all times mentioned herein, Defendant Bluestone Asset Management, LLC was engaged in the management of properties and specifically was engaged in the management of the Property.

23. At all times mentioned herein, Defendant Bluestone Asset Management, LLC had such control over the Premises that Defendant Bluestone Asset Management, LLC owed certain duties to Plaintiff, the breach of which proximately caused the injuries set forth herein.

24. Defendant Bluestone Asset Management, LLC, Defendant's agents, servants, and employees negligently permitted the stairs to become slippery and in bad condition; negligently or willfully allowed such conditions to continue; and negligently or willfully failed to warn Plaintiff of the conditions of the stairs and its floor. Such conditions existed despite the fact that Defendant Bluestone Asset Management, LLC or Defendant's agents knew or should have known of the existence of the aforementioned conditions and that there was likelihood of a person being injured as occurred to Plaintiff.

25. Furthermore, Plaintiff would show the Court that the conditions of the



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stair had continued for such period that, had Defendant Bluestone Asset Management, LLC or Defendant's agents exercised ordinary care in the inspection and maintenance of the stairs and its floor surface area, it would have been noticed and corrected by such persons.

26. At all times pertinent herein, Defendant Bluestone Asset Management, LLC, and any of Defendant's agents, who were acting in the scope of their employment, were guilty of negligent conduct toward the Plaintiff in:

- A. failing to properly inspect and maintain the stairs area in question to discover the dangerous condition;
- B. failing to maintain the stairs in a reasonably safe condition;
- C. failing to give adequate and understandable warnings to Plaintiff of the unsafe conditions of the stairs; and
- D. failing to give warnings to Plaintiff of the unsafe conditions.

**LIABILITY OF DEFENDANT RAYBEC CROSSING COURT, LLC**

27. At all times mentioned herein, Defendant Raybec Crossing Court, LLC owned the Property.

28. At all times mentioned herein, Defendant Raybec Crossing Court, LLC had such control over the premises that Defendant Raybec Crossing Court, LLC owed certain duties to Plaintiff, the breach of which proximately caused the injuries set forth herein.

29. Defendant Raybec Crossing Court, LLC, Defendant's agents, servants, and employees negligently permitted the stairs to become slippery and in bad condition negligently or willfully allowed such conditions to continue and

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negligently or willfully failed to warn Plaintiff of the conditions of the stairs and its floor. Such conditions existed despite the fact that Defendant Raybec Crossing Court, LLC or Defendant's agents knew or should have known of the existence of the aforementioned conditions and that there was likelihood of a person being injured as occurred to Plaintiff.

30. Furthermore, Plaintiff would show the Court that the condition of the stairs had continued for such period that, had Defendant Raybec Crossing Court, LLC or Defendant's agents exercised ordinary care in the inspection and maintenance of the stairs and its floor surface area, it would have been noticed and corrected by such persons.

31. At all times pertinent herein, Defendant Raybec Crossing Court, LLC, and any of Defendant's agents, who were acting in the scope of their employment, were guilty of negligent conduct toward the Plaintiff in:

- A. failing to properly inspect and maintain the stairs area in question to discover the dangerous condition;
- B. failing to maintain the stairs in a reasonably safe condition;
- C. failing to give adequate and understandable warnings to Plaintiff of the unsafe condition of the stairs; and
- D. failing to give warnings to Plaintiff of the unsafe condition.

**LIABILITY OF DEFENDANT RAYBEC CROSSING NORTH, LLC**

32. At all times mentioned herein, Defendant Raybec Crossing North, LLC owned the Property.

33. At all times mentioned herein, Defendant Raybec Crossing North, LLC

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had such control over the premises that Defendant Raybec Crossing North, LLC owed certain duties to Plaintiff, the breach of which proximately caused the injuries set forth herein.

34. Defendant Raybec Crossing North, LLC, Defendant's agents, servants, and employees negligently permitted the stairs to become slippery and in bad condition negligently or willfully allowed such conditions to continue and negligently or willfully failed to warn Plaintiff of the conditions of the stairs and its floor. Such conditions existed despite the fact that Defendant Raybec Crossing North, LLC or Defendant's agents knew or should have known of the existence of the aforementioned conditions and that there was likelihood of a person being injured as occurred to Plaintiff.

35. Furthermore, Plaintiff would show the Court that the condition of the stairs had continued for such period that, had Defendant Raybec Crossing North, LLC or Defendant's agents exercised ordinary care in the inspection and maintenance of the stairs and its floor surface area, it would have been noticed and corrected by such persons.

36. At all times pertinent herein, Defendant Raybec Crossing North, LLC, and any of Defendant's agents, who were acting in the scope of their employment, were guilty of negligent conduct toward the Plaintiff in:

- A. failing to properly inspect and maintain the stairs area in question to discover the dangerous condition;
- B. failing to maintain the stairs in a reasonably safe condition;
- C. failing to give adequate and understandable warnings to

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Plaintiff of the unsafe condition of the stairs; and

D. failing to give warnings to Plaintiff of the unsafe condition.

**PROXIMATE CAUSE**

37. Each and every, all and singular of the foregoing acts and omissions, on the part of Defendants, taken separately and/or collectively, constitute a direct and proximate cause of the injuries and damages set forth below.

**EXEMPLARY DAMAGES**

38. Defendants', jointly and severally, acts or omissions described above, when viewed from the standpoint of Defendants, at the time of the acts or omissions, involved an extreme degree of risk, considering the probability and magnitude of the potential harm to Plaintiff and others. Defendants had actual, subjective awareness of the risk involved in the above described acts or omissions, but nevertheless proceeded with conscious indifference and disregard to the rights, safety, or welfare of Plaintiff and others.

39. Based on the facts stated herein, Plaintiff requests exemplary damages be awarded to Plaintiff from Defendants.

**DAMAGES TO PLAINTIFF**

40. As a direct and proximate result of the occurrence made the basis of this lawsuit, and Defendants' acts as described herein, Plaintiff was caused to suffer bodily injuries, and to endure anxiety, pain, and illness resulting in damages more fully set forth below:

A. Reasonable medical care and expenses in the past. These

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expenses were incurred by Plaintiff for the necessary care and treatment of the injuries resulting from the accident complained of herein and such charges are reasonable and were usual and customary charges for such services in Hidalgo County, Texas, unliquidated;

- B. Reasonable and necessary medical care and expenses which will, in all reasonable probability, be incurred in the future, unliquidated;
- C. Physical pain and suffering in the past, unliquidated;
- D. Mental anguish in the past, unliquidated;
- E. Physical pain and suffering in the future, unliquidated;
- F. Mental anguish in the future, unliquidated;
- G. Fear of future disease or condition, unliquidated; and
- H. Cost of medical monitoring and prevention in the future, unliquidated.

41. By reason of the above, Plaintiff has suffered losses and damages in a sum within the jurisdictional limits of the Court and for which this lawsuit is brought.

**PRAYER**

**WHEREFORE, PREMISES CONSIDERED,** Plaintiff, Raquel Ruth Moreno, respectfully prays that the Defendants be cited to appear and answer herein, and that upon a final hearing of the cause, judgment be entered for the Plaintiff against Defendants, jointly and severally, for damages in an amount within the jurisdictional limits of the Court; together with pre-judgment interest (from the date of injury through the date of judgment) at the maximum rate allowed by law; post-judgment interest at the legal rate, costs of Court; and such other and further

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relief to which the Plaintiff may be entitled at law or in equity.

Respectfully submitted,

*s/ Ricardo A. Rdz*

Ricardo A. Rodriguez  
Texas Bar No. 00788305  
7001 N. 10th St., Suite 302  
McAllen, TX 78504  
Tel. (956) 686-5336  
Fax. (956) 686-5350  
Email rardzp@gmail.com  
Attorney for Plaintiff  
Raquel Ruth Moreno

**PLAINTIFF HEREBY DEMANDS TRIAL BY JURY**

**RICARDO A. RODRIGUEZ**  
ATTORNEY AT LAW  
7001 N. 10<sup>th</sup> ST. Suite 302  
McAllen, TX 78504  
Tel: 956/686-5336 Fax: 956/686-5350  
Mob: 956/458-4310  
[rardzp@gmail.com](mailto:rardzp@gmail.com)

April 15, 2019.

Clerk  
389<sup>th</sup> District Court  
Hidalgo County Courthouse  
100 N. Closner  
Edinburg, Texas 78539

This Request is made by Raquel Ruth Moreno, Plaintiff, Cause No. C-1682-19-H in accordance to TRCP 99, who requests the Clerk to issue:

1. Citation with notice of sue to be served by certified mail, return receipt request, on Defendant, Norman Litz, Bluestone Asset Management, LLC, 7855 Gross Point Rd. UT F, Skokie, IL 60077.

Respectfully submitted,

/s/ Ricardo A. Rodriguez

Ricardo A. Rodriguez  
State Bar No. 00788305  
[rardzp@gmail.com](mailto:rardzp@gmail.com)  
Attorney for Plaintiff



# LAURA HINOJOSA

## HIDALGO COUNTY DISTRICT CLERK

Greetings:

Attached you will find the service requested.

May this serve to inform you that service has been issued. Please proceed in attaching any file stamped documents that need to be served on your issued service.

Please note, the link you are about to open is a "live link" notification. Please ensure you are printing the service which includes our clerk's signature and the State Seal. If you are opening a document without the official certification (signature and seal), please close the window until the document is processed accordingly. This may take a few minutes.

\* When serving protective orders, please DO NOT serve the TCIC form to respondent.

We appreciate the opportunity to assist you. Please contact our office if you have any questions or require additional information.

Sincerely,

A handwritten signature in cursive script that reads "Laura Hinojosa".

Laura Hinojosa  
Hidalgo County District Clerk



**C-1682-19-H**  
**389TH DISTRICT COURT, HIDALGO COUNTY, TEXAS**

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**CITATION**

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**THE STATE TEXAS**

**NOTICE TO DEFENDANT:** You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty (20) days after you were served this citation and petition, a default judgment may be taken against you.

**Bluestone Asset Management, LLC**  
**C/O NORMAN LITZ**  
**7855 GROSS POINT RD. UTF**  
**SKOKIE, IL 60077**

You are hereby commanded to appear by filing a written answer to the PLAINTIFF'S ORIGINAL PETITION at or before 10:00 o'clock a.m. on the Monday next after the expiration of twenty (20) days after the date of service hereof, before the Honorable 389th District Court of Hidalgo County, Texas at the Courthouse, 100 North Closner, Edinburg, Texas 78539.

Said Petition was filed on this the 15th day of April, 2019 and a copy of same accompanies this citation. The file number and style of said suit being, **C-1682-19-H, RAQUEL RUTH MORENO VS. BLUESTONE ASSET MANAGEMENT, LLC, RAYBEC CROSSING COURT, LLC, RAYBEC CROSSING NORTH, LLC**

Said Petition was filed in said court by Attorney RICARDO A. RODRIGUEZ, 7001 NORTH 10TH STREET STE 3 McALLEN TX 78504.

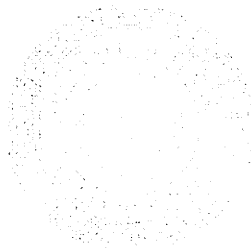
The nature of the demand is fully shown by a true and correct copy of the petition accompanying this citation and made a part hereof.

The officer executing this writ shall promptly serve the same according to requirements of law, and the mandates thereof, and make due return as the law directs.

**ISSUED AND GIVEN UNDER MY HAND AND SEAL** of said Court at Edinburg, Texas on this the 15th day of April, 2019.

**LAURA HINOJOSA, DISTRICT CLERK**  
**100 N. CLOSNER, EDINBURG, TEXAS**  
**HIDALGO COUNTY, TEXAS**

  
**RACHEL BUENO DEPUTY CLERK**



**CERTIFIED MAIL 9214 8901 0661 5400 0137 1541 08**

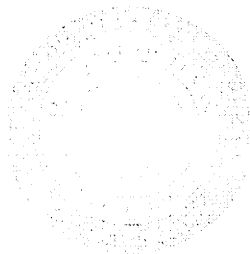
**CERTIFICATE OF RETURN  
UNDER RULES 103 T.R.C.P.**

This is to certify that on this the 15th day of April, 2019 I, Rachel Bueno, Deputy Clerk of the 389th District Court of Hidalgo County, Texas mailed to the defendant in Cause Number C-1682-19-H, Raquel Ruth Moreno VS. Bluestone Asset Management, LLC, Raybec Crossing Court, LLC, Raybec Crossing North, LLC a copy of the citation along with a copy of the petition by certified mail return receipt requested. Return receipt was returned on the \_\_\_\_ day of \_\_\_\_\_, 201\_\_\_\_ (or unserved for the reason on the certificate return) \_\_\_\_\_.

**GIVEN UNDER MY HAND AND SEAL OF SAID COURT**, at office in Edinburg, Texas on this the 15th day of April, 2019.

**LAURA HINOJOSA, DISTRICT CLERK  
HIDALGO COUNTY, TEXAS**

  
**RACHEL BUENO, DEPUTY CLERK**



**COMPLETE IF YOU ARE PERSON OTHER THAN A SHERIFF,  
CONSTABLE OR CLERK OF THE COURT**

In accordance to Rule 107, the officer or authorized person who serves or attempts to serve a citation must sign the return. If the return is signed by a person other than a sheriff, constable or the clerk of the court, the return must either be verified or be signed under the penalty of perjury. A return signed under penalty of perjury must contain the statement below in substantially the following form:

"My name is \_\_\_\_\_, my date of birth is \_\_\_\_\_ and the address is \_\_\_\_\_, and I declare under penalty of perjury that the foregoing is true and correct.

**EXECUTED** in \_\_\_\_\_ County, State of Texas, on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
**Declarant"**

\_\_\_\_\_  
**If Certified by the Supreme Court of Texas  
Date of Expiration / SCH Number**



LAURA HINOJOSA  
HIDALGO COUNTY DISTRICT CLERK  
PO BOX 67  
EDINBURG, TX 78540-0067



9214 8901 0661 5400 0137 1541 08

RETURN RECEIPT (ELECTRONIC)

C-1682-19-H

BLUESTONE ASSET MANAGEMENT, LLC  
C/O NORMAN LITZ  
7855 GROSS POINT RD. UTF  
SKOKIE, IL 60077

RETURN SERVICE  
REQUESTED

CUT / FOLD HERE

Zone 6

8"x9" ENVELOPE  
CUT / FOLD HERE

CUT / FOLD HERE

**RICARDO A. RODRIGUEZ**  
ATTORNEY AT LAW  
7001 N. 10<sup>th</sup> ST. Suite 302  
McAllen, TX 78504  
Tel: 956/686-5336 Fax: 956/686-5350  
Mob: 956/458-4310  
[rardzp@gmail.com](mailto:rardzp@gmail.com)

May 1, 2019.

Clerk  
389<sup>th</sup> District Court  
Hidalgo County Courthouse  
100 N. Closner  
Edinburg, Texas 78539

This Request is made by Raquel Ruth Moreno, Plaintiff, Cause No. C-1682-19-H in accordance to TRCP 99, who requests the Clerk to issue:

1. Citation with notice of sue to be served by certified mail, return receipt request, on Defendant, Raybec Crossing Court, LLC, 7855 Gross Point Rd. UT F, Skokie, IL 60077; and
2. Citation with notice of sue to be served by certified mail, return receipt request, on Defendant, Raybec Crossing North, LLC, 7855 Gross Point Rd. UT F, Skokie, IL 60077

Respectfully submitted,

/s/ Ricardo A. Rodriguez

Ricardo A. Rodriguez  
State Bar No. 00788305  
[rardzp@gmail.com](mailto:rardzp@gmail.com)  
Attorney for Plaintiff



# LAURA HINOJOSA

## HIDALGO COUNTY DISTRICT CLERK

Greetings:

Attached you will find the service requested.

May this serve to inform you that service has been issued. Please proceed in attaching any file stamped documents that need to be served on your issued service.

Please note, the link you are about to open is a "live link" notification. Please ensure you are printing the service which includes our clerk's signature and the State Seal. If you are opening a document without the official certification (signature and seal), please close the window until the document is processed accordingly. This may take a few minutes.

\* When serving protective orders, please DO NOT serve the TCIC form to respondent.

We appreciate the opportunity to assist you. Please contact our office if you have any questions or require additional information.

Sincerely,

A handwritten signature in cursive script that reads "Laura Hinojosa".

Laura Hinojosa  
Hidalgo County District Clerk

**C-1682-19-H**  
**389TH DISTRICT COURT, HIDALGO COUNTY, TEXAS**

---

**CITATION**

---

**THE STATE TEXAS**

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**NOTICE TO DEFENDANT:** You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty (20) days after you were served this citation and petition, a default judgment may be taken against you.

**Raybec Crossing North, LLC**  
**7855 GROSS POINT RD. UT F**  
**SKOKIE, IL 60077**

You are hereby commanded to appear by filing a written answer to the PLAINTIFF'S ORIGINAL PETITION at or before 10:00 o'clock a.m on the Monday next after the expiration of twenty (20) days after the date of service hereof, before the Honorable 389th District Court of Hidalgo County, Texas at the Courthouse, 100 North Closner, Edinburg, Texas 78539.

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Said Petition was filed in said court by Attorney RICARDO A. RODRIGUEZ, 7001 NORTH 10TH STREET STE 3 McALLEN TX 78504.

The nature of the demand is fully shown by a true and correct copy of the petition accompanying this citation and made a part hereof.

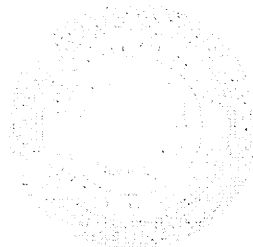
The officer executing this writ shall promptly serve the same according to requirements of law, and the mandates thereof, and make due return as the law directs.

**ISSUED AND GIVEN UNDER MY HAND AND SEAL** of said Court at Edinburg, Texas on this the 7th day of May, 2019.

**LAURA HINOJOSA, DISTRICT CLERK**  
**100 N. CLOSNER, EDINBURG, TEXAS**  
**HIDALGO COUNTY, TEXAS**



**RACHEL BUENO DEPUTY CLERK**



**CERTIFIED MAIL 92148901066154000137932669**

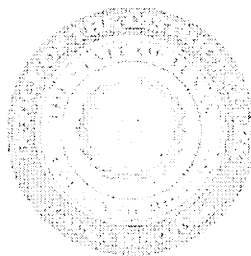
**CERTIFICATE OF RETURN  
UNDER RULES 103 T.R.C.P.**

This is to certify that on this the 7th day of May, 2019 I, Rachel Bueno, Deputy Clerk of the 389th District Court of Hidalgo County, Texas mailed to the defendant in Cause Number C-1682-19-H, Raquel Ruth Moreno VS. Bluestone Asset Management, LLC, Raybec Crossing Court, LLC, Raybec Crossing North, LLC a copy of the citation along with a copy of the petition by certified mail return receipt requested. Return receipt was returned on the \_\_\_\_ day of \_\_\_\_\_, 201\_\_\_\_ (or unserved for the reason on the certificate return) \_\_\_\_\_.

**GIVEN UNDER MY HAND AND SEAL OF SAID COURT**, at office in Edinburg, Texas on this the 7th day of May, 2019.

**LAURA HINOJOSA, DISTRICT CLERK  
HIDALGO COUNTY, TEXAS**

*Rachel Bueno*  
**RACHEL BUENO, DEPUTY CLERK**



**COMPLETE IF YOU ARE PERSON OTHER THAN A SHERIFF,  
CONSTABLE OR CLERK OF THE COURT**

In accordance to Rule 107, the officer or authorized person who serves or attempts to serve a citation must sign the return. If the return is signed by a person other than a sheriff, constable or the clerk of the court, the return must either be verified or be signed under the penalty of perjury. A return signed under penalty of perjury must contain the statement below in substantially the following form:

"My name is \_\_\_\_\_, my date of birth is \_\_\_\_\_ and the address is \_\_\_\_\_, and I declare under penalty of perjury that the foregoing is true and correct.

**EXECUTED** in \_\_\_\_\_ County, State of Texas, on the \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
**Declarant"**

\_\_\_\_\_  
**If Certified by the Supreme Court of Texas  
Date of Expiration / SCH Number**

**C-1682-19-H**  
**389TH DISTRICT COURT, HIDALGO COUNTY, TEXAS**

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**CITATION**

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**THE STATE TEXAS**

**NOTICE TO DEFENDANT:** You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty (20) days after you were served this citation and petition, a default judgment may be taken against you.

**Raybec Crossing Court, LLC**  
**7855 GROSS POINT RD. UT F**  
**SKOKIE, IL 60077**

You are hereby commanded to appear by filing a written answer to the PLAINTIFF'S ORIGINAL PETITION at or before 10:00 o'clock a.m on the Monday next after the expiration of twenty (20) days after the date of service hereof, before the Honorable 389th District Court of Hidalgo County, Texas at the Courthouse, 100 North Closner, Edinburg, Texas 78539.

Said Petition was filed on this the 15th day of April, 2019 and a copy of same accompanies this citation. The file number and style of said suit being, **C-1682-19-H, RAQUEL RUTH MORENO VS. BLUESTONE ASSET MANAGEMENT, LLC, RAYBEC CROSSING COURT, LLC, RAYBEC CROSSING NORTH, LLC**

Said Petition was filed in said court by Attorney RICARDO A. RODRIGUEZ, 7001 NORTH 10TH STREET STE 3 McALLEN TX 78504.

The nature of the demand is fully shown by a true and correct copy of the petition accompanying this citation and made a part hereof.

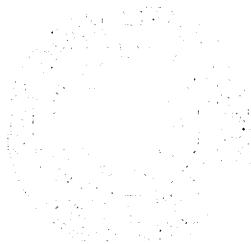
The officer executing this writ shall promptly serve the same according to requirements of law, and the mandates thereof, and make due return as the law directs.

**ISSUED AND GIVEN UNDER MY HAND AND SEAL** of said Court at Edinburg, Texas on this the 7th day of May, 2019.

**LAURA HINOJOSA, DISTRICT CLERK**  
**100 N. CLOSNER, EDINBURG, TEXAS**  
**HIDALGO COUNTY, TEXAS**



**RACHEL BUENO DEPUTY CLERK**





**CERTIFIED MAIL 92148901066154000137932645**

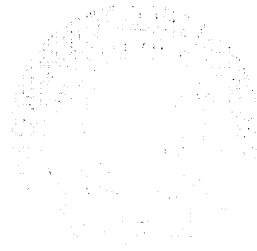
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**LAURA HINOJOSA, DISTRICT CLERK  
HIDALGO COUNTY, TEXAS**

  
**RACHEL BUENO, DEPUTY CLERK**



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**EXECUTED** in \_\_\_\_\_ County, State of Texas, on the \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
**Declarant"**

\_\_\_\_\_  
**If Certified by the Supreme Court of Texas  
Date of Expiration / SCH Number**



LAURA HINOJOSA  
HIDALGO COUNTY DISTRICT CLERK  
PO BOX 87  
EDINBURG, TX 78540-0087



9214 8901 0661 5400 0137 9326 69

RETURN RECEIPT (ELECTRONIC)

C-1682-19-H

RAYBEC CORSSING NORTH, LLC  
7855 GROSS POINT RD. UT F  
SKOKIE, IL 60077

RETURN SERVICE  
REQUESTED

CUT / FOLD HERE

Zone 6

8"x9" ENVELOPE  
CUT / FOLD HERE

CUT / FOLD HERE



LAURA HINOJOSA  
HIDALGO COUNTY DISTRICT CLERK  
PO BOX 87  
EDINBURG, TX 78540-0087



9214 8901 0661 5400 0137 9326 45

RETURN RECEIPT (ELECTRONIC)

C-1682-19-H

RAYBEC CORSSING COURT, LLC  
7855 GROSS POINT RD. UT F  
SKOKIE, IL 60077

RETURN SERVICE  
REQUESTED

CUT / FOLD HERE

Zone 6

6"X9" ENVELOPE  
CUT / FOLD HERE

CUT / FOLD HERE

**WHEREFORE, Defendant BLUESTONE ASSET MANAGEMENT, LLC prays that Plaintiff recover nothing from it by way of this suit; that this Defendant recover costs of court, and for such other and further relief, both at law and in equity, to which this Defendant may be justly entitled.**

051019 JAG:lea: 7200-057 ANS/JID

Respectfully submitted,

**BROCK ♦ GUERRA**  
**STRANDMO DIMALINE JONES, P.C.**  
17339 Redland Road  
San Antonio, Texas 78247-2304  
(210) 979-0100 Telephone  
(210) 979-7810 Facsimile

BY: 

JOHN A. GUERRA  
State Bar No. 08576180  
Email: [jguerra@brock.law](mailto:jguerra@brock.law)  
AMANDA E. CAROLLO  
State Bar No. 24080882  
Email: [acarollo@brock.law](mailto:acarollo@brock.law)

ATTORNEYS FOR DEFENDANT  
**BLUESTONE ASSET MANAGEMENT, LLC**

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing has been served in accordance with the Texas Rules of Civil Procedure on this 5 day of May, 2019, to:

Ricardo A. Rodriguez  
Attorney at Law  
7001 N. 10<sup>th</sup> St., Suite 302  
McAllen, Texas 78504

Fax No. 956/686-5350  
Email: [rardzp@gmail.com](mailto:rardzp@gmail.com)

  
JOHN A. GUERRA  
AMANDA E. CAROLLO

051019 JAG:lea: 7200-057 ANS/JD

## CAUSE NO. C-1682-19-H

RAQUEL RUTH MORENO

Plaintiff,

vs.

BLUESTONE ASSET MANAGEMENT,  
LLC, RAYBEC CROSSING COURT, LLC  
and RAYBEC CROSSING NORTH, LLC

Defendants.

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IN THE DISTRICT COURT

389TH JUDICIAL DISTRICT

HIDALGO COUNTY, TEXAS

**DEFENDANT BLUESTONE ASSET MANAGEMENT, LLC'S  
DEMAND FOR JURY**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES BLUESTONE ASSET MANAGEMENT, LLC, Defendant in the above-entitled and numbered cause, and makes this DEMAND FOR JURY TRIAL.

Respectfully submitted,

**BROCK ♦ GUERRA**  
**STRANDMO DIMALINE JONES, P.C.**  
 17339 Redland Road  
 San Antonio, Texas 78247-2304  
 (210) 979-0100 Telephone  
 (210) 979-7810 Facsimile

BY: 

JOHN A. GUERRA  
 State Bar No. 08576180  
 Email: [jguerra@brock.law](mailto:jguerra@brock.law)  
 AMANDA E. CAROLLO  
 State Bar No. [acarollo@brock.law](mailto:acarollo@brock.law)  
 Email: [acarollo@brock.law](mailto:acarollo@brock.law)

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McAllen, Texas 78504

Fax No. 956/686-5350  
Email: rardzp@gmail.com

  
\_\_\_\_\_  
JOHN A. GUERRA  
AMANDA E. CAROLLO

# BROCK ♦ GUERRA

STRANDMO DIMALINE JONES

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

17339 REDLAND ROAD  
SAN ANTONIO, TEXAS 78247-2304  
(210) 979-0100 TELEPHONE  
(210) 979-7810 FACSIMILE

A.J. DIMALINE IV  
JOHN A. GUERRA  
GREGORY R. HOKENSON  
SCOTT P. JONES ♦♦♦  
THOMAS A. MAILLOUX II ■  
MARK R. STRANDMO ♦  
JASON L. WEST \*

ROY C. BROCK (1925-2008)

OF COUNSEL:  
CHRISTOPHER M. BLANTON ♦  
DANIEL J. GUARASCI

BRITTANY K. BARRERA  
AMANDA E. CAROLLO  
MICHAEL A. DIAL \*  
CELIA E. GARCIA  
KIMBERLY PAINTER HALL  
MICHAEL D. JOY, II  
KIMBERLY A. KAYATTA  
ROBERT BRAD MCGANN ♦  
JAMES E. RAMSEY ♦  
FREDERICK 'FRED' SAPORSKY III  
BRAD M. STAUBER  
ROBERT R. STEARNS •  
VANESSA E. VALDEZ

May 14, 2019

Laura Hinojosa, District Clerk  
Hidalgo County Courthouse  
100 North Closner  
Edinburg, TX 78539

*Via E-Filing*

RE: Cause No. C-1682-19-H; 389<sup>th</sup> District Court, Hidalgo County, Texas  
Raquel Ruth Moreno vs. Bluestone Asset Management, LLC, et al  
Our File No. 7200-057

Dear Sir/Madam:

We would like to request certified copies of the entire above-referenced file, including the docket sheet. Copies have been paid for through the e-filing system. Please mail the copies to my attention at the above address as soon as possible.

Thank you for your assistance. Do not hesitate to contact our office should you have questions or need anything further.

Sincerely,

**BROCK ♦ GUERRA**

By: *Amanda E. Carollo*  
JOHN A. GUERRA  
AMANDA E. CAROLLO